

Pro Se 1 (Rev. 12/16) Complaint for a Civil Case

UNITED STATES DISTRICT COURT

for the

District of

Division

Case No.

1:25cv01113
(to be filled in by the Clerk's Office)

Jury Trial: (check one)

☒ Yes ☐ NoBrandon Bradshaw

Plaintiff(s)

(Write the full name of each plaintiff who is filing this complaint. If the names of all the plaintiffs cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

-v-

Community Realty company, INC. et al

Defendant(s)

(Write the full name of each defendant who is being sued. If the names of all the defendants cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

COMPLAINT FOR A CIVIL CASE

I. The Parties to This Complaint

A. The Plaintiff(s)

Provide the information below for each plaintiff named in the complaint. Attach additional pages if needed.

Name

Street Address

City and County

State and Zip Code

Telephone Number

E-mail Address

Brandon Bradshaw
85 White Pine Cir APT 201
Stafford
VA, 22554
305 968 7983
Brandon6685@yahoo.com

B. The Defendant(s)

Provide the information below for each defendant named in the complaint, whether the defendant is an individual, a government agency, an organization, or a corporation. For an individual defendant, include the person's job or title (if known). Attach additional pages if needed.

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B. The Defendant(s)

Provide the information below for each defendant named in the complaint, whether the defendant is an individual, a government agency, an organization, or a corporation. For an individual defendant, include the person's job or title (*if known*). Attach additional pages if needed.

Defendant No. 1

Name	Benjamin Zeitler
Job or Title (<i>if known</i>)	Director
Street Address	11161 New Hampshire Avenue suite 200
City and County	Silver Spring Montgomery County
State and Zip Code	MD 20904
Telephone Number	301-345-3334
E-mail Address (<i>if known</i>)	

Defendant No. 2

Name	Howard B Silberberg ESQ
Job or Title (<i>if known</i>)	Registered Agent
Street Address	6451 Johns Road
City and County	Fall Church Fairfax
State and Zip Code	VA, 22043
Telephone Number	
E-mail Address (<i>if known</i>)	

Defendant No. 3

Name	Community Realty company, INC.
Job or Title (<i>if known</i>)	11161 New Hampshire Ave Suite 200
Street Address	
City and County	Silver Spring Montgomery county
State and Zip Code	MD 20904
Telephone Number	301-345-3334
E-mail Address (<i>if known</i>)	

Defendant No. 4

Name	
Job or Title (<i>if known</i>)	
Street Address	
City and County	
State and Zip Code	
Telephone Number	

E-mail Address *(if known)* _____**II. Basis for Jurisdiction**

Federal courts are courts of limited jurisdiction (limited power). Generally, only two types of cases can be heard in federal court: cases involving a federal question and cases involving diversity of citizenship of the parties. Under 28 U.S.C. § 1331, a case arising under the United States Constitution or federal laws or treaties is a federal question case. Under 28 U.S.C. § 1332, a case in which a citizen of one State sues a citizen of another State or nation and the amount at stake is more than \$75,000 is a diversity of citizenship case. In a diversity of citizenship case, no defendant may be a citizen of the same State as any plaintiff.

What is the basis for federal court jurisdiction? *(check all that apply)*

- ☒ Federal question ☐ Diversity of citizenship

Fill out the paragraphs in this section that apply to this case.

A. If the Basis for Jurisdiction Is a Federal Question

List the specific federal statutes, federal treaties, and/or provisions of the United States Constitution that are at issue in this case.

This case arises under Title VII of the Civil Rights Act of 1964, 42 U.S.C. 2000e et seq., which prohibits employment discrimination based on race, color, religion, sex, or national origin.

B. If the Basis for Jurisdiction Is Diversity of Citizenship**1. The Plaintiff(s)****a. If the plaintiff is an individual**

The plaintiff, *(name)* _____, is a citizen of the State of *(name)* _____.

b. If the plaintiff is a corporation

The plaintiff, *(name)* _____, is incorporated under the laws of the State of *(name)* _____, and has its principal place of business in the State of *(name)* _____.

(If more than one plaintiff is named in the complaint, attach an additional page providing the same information for each additional plaintiff.)

2. The Defendant(s)**a. If the defendant is an individual**

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The defendant, (name) _____, is a citizen of
 the State of (name) _____. Or is a citizen of
 (foreign nation) _____.

b. If the defendant is a corporation

The defendant, (name) _____, is incorporated under
 the laws of the State of (name) _____, and has its
 principal place of business in the State of (name) _____.
 Or is incorporated under the laws of (foreign nation) _____,
 and has its principal place of business in (name) _____.

(If more than one defendant is named in the complaint, attach an additional page providing the same information for each additional defendant.)

3. The Amount in Controversy

The amount in controversy—the amount the plaintiff claims the defendant owes or the amount at stake—is more than \$75,000, not counting interest and costs of court, because *(explain)*:

III. Statement of Claim

Write a short and plain statement of the claim. Do not make legal arguments. State as briefly as possible the facts showing that each plaintiff is entitled to the damages or other relief sought. State how each defendant was involved and what each defendant did that caused the plaintiff harm or violated the plaintiff's rights, including the dates and places of that involvement or conduct. If more than one claim is asserted, number each claim and write a short and plain statement of each claim in a separate paragraph. Attach additional pages if needed.

I was employed by Community Realty Company, Inc. as a Leasing Manager in Fairfax County, Virginia. During my employment, I reported concerns to my supervisor and others about being subjected to racial and sexual harassment in the workplace. Specifically, on or about December 11, 2023, I complained about the hostile work environment and the abuse I was experiencing.

The company did not take any steps to investigate or address my concerns. Instead, shortly afterward, on or about December 21, 2023, the company terminated my employment.

I believe I was fired in retaliation for speaking up about the harassment. I filed a charge of discrimination with the EEOC, and I received a Right to Sue letter in 2025. This lawsuit is being filed within the 90-day deadline provided in that letter.

As a result of the company's actions, I have suffered emotional distress, lost income, and other damages.

IV. Relief

State briefly and precisely what damages or other relief the plaintiff asks the court to order. Do not make legal arguments. Include any basis for claiming that the wrongs alleged are continuing at the present time. Include the amounts of any actual damages claimed for the acts alleged and the basis for these amounts. Include any punitive or exemplary damages claimed, the amounts, and the reasons you claim you are entitled to actual or punitive money damages.

I am seeking \$75,000 in damages, which represents the amount I would have earned in salary if I had remained employed with the defendant. I believe I am entitled to this amount because I was wrongfully terminated and have lost income and employment opportunities as a result. I am also seeking any other relief the court finds appropriate.

V. Certification and Closing

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.

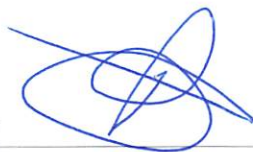
A. For Parties Without an Attorney

I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Date of signing: 07/05/2025

Signature of Plaintiff Brandon Bradshaw

Printed Name of Plaintiff Brandon Bradshaw

**B. For Attorneys**

Date of signing: _____

Signature of Attorney _____

Printed Name of Attorney _____

Bar Number _____

Name of Law Firm _____

Street Address _____

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State and Zip Code

Telephone Number

E-mail Address

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Date of signing: 07/05/2025

Signature of Plaintiff Brandon Bradshaw

Printed Name of Plaintiff Brandon Bradshaw

B. For Attorneys

Date of signing: _____

Signature of Attorney _____

Printed Name of Attorney _____

Bar Number _____

Name of Law Firm _____

Street Address _____

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